REMARKS

Claims 1, 20, 23, 26, 27 and 39 have been amended to better define features of the invention. Support for the amended claims is found at least in cancelled claims 19 and 38 and pages 19-20 of the present application.

1.   Claims 1-3, 8-9, 14, 21-22, 27-29 and 35 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,208,345 B1 to Sheard et al. Amendments to the claims overcome this rejection. The claims now recite a network integration layer that provides for foreign protocol integration for converting a node and a protocol translation service for converting a protocol. Sheard et al. fail to disclose at least this feature.

First, the Office Action fails to show that Sheard et al. disclose a network integration layer, as claimed. The Office Action asserts that a network integration layer is disclosed in Sheard et al. as business extension module #4 at column 17, lines 25-44. Business extension module #4, however, is a module for monitoring networks, not integrating them. Business extension module #4 includes a set of components that provide for the building of network management interfaces. Components and adapters of business extension module #4 provide for service management capabilities, including managing service level agreements, providing interaction with service providers, and managing interactions between services. Likewise, agreements between operators can be managed. Monitoring systems can be developed that verify access for telecommunication service providers, ensure interface conformance to standards-based network management products, identifying system bottlenecks, and verifying system to system equivalence. Col. 17, ll. 24-44. Therefore, while Sheard et al. may disclose a system for managing networks by monitoring them, business module #4 does not teach how to integrate disparate networks.

Second, Sheard et al. fail to disclose an integration framework that provides a network integration layer for integrating components of disparate networks, as required by independent claims 1, 23, 26 and 27. The Office Action is incorrect in its assertion that Sheard et al. disclose selecting a "foreign protocol" to integrate disparate networks at column 7, line 44 through column 8, line 17 and protocol translation at column 8, lines 18-43. To account for different protocols, the system of Sheard et al. disclose the use of an adapter 34a to disassociate an information content component 'A' from its

10

associated format component 'A'. Only the information content 'A' is transmitted to the data exchange infrastructure 32. Col. 8, lines 12-16.

Sheard et al. do not disclose or suggest a network integration layer that provides for converting a node, as recited in the independent claims. The recited foreign protocol integration adapts nodes on the network to support a dominant network protocol that may not have been native to the node. This type of integration differs from a translation service in that the node, not the protocol, is converted. See Spec. page 19, line 30 through page 20, line 18. Indeed, protocol translation does not permit translation between other services such a file transfer protocols.

Since Sheard et al. do not disclose or suggest the claimed network integration layer, Applicants respectfully request that the rejection to claims 1 and 27 be withdrawn. Moreover, claims 2-3, 8-9, 14 and 21-22 depend, directly or indirectly, from claim 1 and claims 28-29 and 35 depend, directly or indirectly from claim 27. Therefore, for at least the reasons discussed with regard to amended claims 1 and 27, Applicants respectfully request that the rejection to claims 1-3, 8-9, 14, 21-22, 28-29 and 35 also be withdrawn.

2.   Claims 4-7, 10, 18-19, 23-26, 30-31 and 37-38 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sheard et al. Amendments to the claims overcome this rejection.

Applicants respectfully request that the rejection to amended independent claims 23 and 26 be withdrawn. As discussed above, Sheard et al. do not disclose or suggest at least an integration framework that provides a network integration layer for integrating components by foreign protocol integration for converting a node and a protocol translation service for converting the protocol. Moreover, claims 4-7, 10 and 18-19 and depend, directly or indirectly, from claim 1, claims 24 and 25 depend from claim 23, and claims 30-31 and 37-38 depend, directly or indirectly from claim 27. Therefore, for at least the reasons discussed with regard to amended independent claims 1, 23, and 27, Applicants respectfully request that the rejection to claims 4-7, 10, 18-19, 24-25, 30-31 and 37-38 also be withdrawn.

3.   Claims 11-12 and 32-33 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sheard et al. in view of U.S. Patent Application No. 2002/0035577 A1 to Bordersen et al. Amendments to the claims overcome this rejection.

Bordersen et al. merely disclose a method and system for collecting, storing and retrieving data in a database management system. The method and system maintain a partially replicated database in such a way that updates made to a central database, or to another partially replicated database are selectively propagated to the partially replicated database. Updates are propagated to the partially replicated database if the owner of the partially replicated database is deemed to have visibility as determined by rules stored in a ruled database.

Claims 11-12 depend from amended claim 1 and claims 32-33 depend from amended claim 27. Neither Sheard et al. nor Bordersen et al., alone or in combination, disclose or suggest, the recited feature of an integration framework wherein the "network integration layer provides for foreign protocol integration for converting a node and a protocol translation service for converting a protocol." Therefore, for at least this reason, Applicants respectfully request that the rejection to claims 11-12 be withdrawn.

4.   Claims 13 and 34 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sheard et al. in view of Bordersen et al. and further in view of U.S. Patent No. 5,596,744 to Dao et al. Amendments to the claims overcome this rejection.

Dao et al. disclose an architecture and system which are flexible for integrated access to heterogeneous database management systems dispersed over a long haul network to allow access to a wide variety of database systems while maintaining an autonomous underlying database system.

Claim 13 depends from amended claim 1 and claim 34 depends from amended claim 27. Neither Sheard et al., Bordersen et al., nor Dao et al., alone or in combination, disclose or suggest, the recited feature of an integration framework wherein the "network integration layer provides for foreign protocol integration for converting a node and a protocol translation service for converting a protocol." Therefore, for at least this reason, Applicants respectfully request that the rejection to claims 13 and 34 be withdrawn.

5.   Claims 15-17 and 36 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sheard et al. in view of U.S. Patent No. 6,041,362 to Mears et al. Amendments to the claims overcome this rejection.

Mears et al. merely discloses a method and system that provides a web client interface that connects through an enterprise network to an application integrating server such as a Hyper-Text Transfer Protocol (HTTP) server.

Claims 15-17 depend from amended claim 1 and claim 36 depends from amended claim 27. Neither Sheard et al. nor Mears, alone or in combination, disclose or suggest, the recited feature of an integration framework wherein the "network integration layer provides for foreign protocol integration for converting a node and a protocol translation service for converting a protocol." Therefore, for at least this reason, Applicants respectfully request that the rejection to claims 15-17 and 36 be withdrawn.

6.   Claims 20 and 39-40 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sheard et al. in view of U.S. Patent No. 6,418,324 B1 to Doviak et al. Amendments to the claims overcome this rejection.
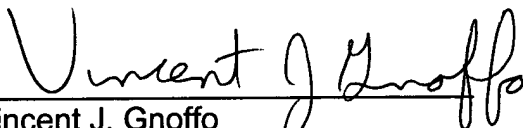
Doviak et al. disclose an apparatus and method for the transparent communication of data between a remote device and a fixed communication host network.

Claim 20 depends from amended claim 1 and claims 39-40 depend from amended claim 27. Neither Sheard et al. nor Doviak et al., alone or in combination, disclose or suggest, the recited feature of an integration framework wherein the "network integration layer provides for foreign protocol integration for converting a node and a protocol translation service for converting a protocol." Therefore, for at least this reason, Applicants respectfully request that the rejection to claims 20 and 39-40 be withdrawn.

CONCLUSION

Applicants submit that all of the pending claims are in condition for allowance and notice to this effect is respectfully requested. The Examiner is invited to call the undersigned if it would expedite the prosecution of this application.

Respectfully submitted,

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